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January 27, 2022

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

**Re: *Sjunde AP-Fonden v. The Goldman Sachs Group, Inc. et al.*, No. 1:18-cv-12084 (VSB)**

Dear Judge Broderick:

Pursuant to Rules 5.B.ii-iii of Your Honor's Individual Rules and Practices in Civil Cases, Defendants in the above-captioned action respectfully request leave of this Court to file: (1) in redacted form, a copy of Defendants' Brief in Opposition to Lead Plaintiff's Motion for Class Certification (the "Opposition Brief"); and (2) under seal, an excerpted transcript of Plaintiff's Rule 30(b)(6) deposition testimony in this matter, dated December 14, 2021 (the "Rule 30(b)(6) Transcript"). The Rule 30(b)(6) Transcript is Exhibit 4 to the Declaration of John E. Schreiber, being filed today in support of the Opposition Brief.

Pursuant to Rule 5.B.iii-(b)-(c), we are contemporaneously filing with this letter motion: (1) a copy of the Opposition Brief containing Defendants' proposed redactions; (2) under seal, an unredacted copy of the Opposition Brief with Defendants' proposed redactions highlighted; and (3) under seal, a copy of the Rule 30(b)(6) Transcript (Exhibit 4 to the Schreiber Declaration).

The basis for this request is that Plaintiff has designated the entirety of its Rule 30(b)(6) Transcript as Confidential under the parties' Stipulated Protective Order (ECF No. 135), and Defendants' Opposition Brief refers to or quotes portions of testimony from that transcript. Pursuant to Rule 5.B.iii-a, Defendants conferred with Plaintiff's counsel on this matter, who requested that these materials be redacted and/or sealed until counsel has had the opportunity to confer with its client on the matter.

Pursuant to the Stipulated Protective Order, Defendants do not take a position on Plaintiff's confidentiality designation and/or its position on redaction or sealing. ECF No. 135, ¶ 9 ("In making such a filing [in redacted form or under seal], a Receiving Party may rely on the Designating Party's designation of any Discovery Material and need not independently verify, or take a position on, such Designating Party's designation").

Please do not hesitate to contact me if you have any questions.



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Respectfully,

/s/ John E. Schreiber

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*Attorney for The Goldman Sachs Group, Inc.*

cc: All Counsel of Record (by ECF)

**APPLICATION GRANTED**

**SO ORDERED**

**VERNON S. BRODERICK**

**U.S.D.J.** 01/28/2022

Defendants are directed to Rule 5.B. of my Individual Rules & Practices in Civil Cases and to meet and confer with Plaintiff as necessary to determine if Defendants' Brief in Opposition to Lead Plaintiff's Motion for Class Certification and the excerpted transcript of Plaintiff's Rule 30(b)(6) deposition testimony in this matter can be filed in redacted form on ECF.